

AO 91 (Rev. 11/11) Criminal Complaint

United States District Court  
Southern District of Texas  
FILED

MAR 24 2020

## UNITED STATES DISTRICT COURT

David J. Bradley, Clerk

for the

SOUTHERN DISTRICT OF TEXAS

United States of America

v.

SERGIO ALEJANDRO QUINTANILLA

~~XXXXXXXXXXXX~~

U.S. Citizen

Year of birth: 1989

Case No. M-20-799-M

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 3/23/2020 in the county of Starr in the  
Southern District of Texas, the defendant(s) violated:

## Code Section


21 USC 841 (a) (1)

## Offense Description

Possession with Intent to Distribute  
Marijuana, approximately 207.50  
Kilograms, a schedule I controlled  
substance.

This criminal complaint is based on these facts:

(See Attachment I).

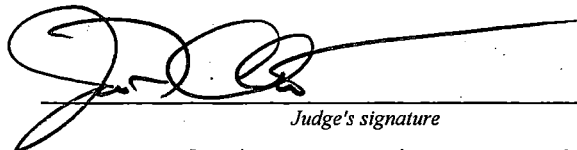
☒ Continued on the attached sheet.Approved on 3/24/20 by AUSA  
Kristina Pekkala  


Sworn to before me and signed in my presence.

Date: 3/23/2020 - 3:34 PMCity and state: McAllen, Texas  
Complainant's signature

Ashley Mendiola, DEA Special Agent

Printed name and title

  
Judge's signature

Juan F. Alanis, US Magistrate Judge

Printed name and title

# ATTACHMENT I

On March 22, 2020, Members of the Rio Grande City Border Patrol Flex team were conducting Lay-In Operations in Garceno, Texas. At approximately 8:00 pm, United States Border Patrol Agents (USBPA) observed a raft with multiple subjects floating north to the southwest corner of an area known as "Brickyard" in Garceno, Texas. Agents walked north from the river after observing the raft so they could observe the open fields, in order to set up an interdiction of the vehicle with marked units. Shortly after walking north into the fields, agents observed a vehicle driving southbound toward the river near the location where the raft had originally crossed. The vehicle remained in close proximity to the river for approximately 5 minutes then proceeded to drive northbound at a high rate of speed.

Agents responded to the Brickyard main dropdown location and observed the taillights of a vehicle. Agents observed the vehicle driving southbound erratically in an attempt to evade apprehension from responding unit. Agents then observed the vehicle reach the river embankment and crashed, causing it to land on its passenger side. Agents approached the vehicle and observed a subject, who was later identified as Sergio QUINTANILLA in between the front seats and suspected bundles of narcotics surrounding him in the vehicle. Agents then extracted the driver from the vehicle to prevent him from being trapped due to the driver being in an unsafe position within the vehicle. Agents located a total of seven (7) bundles of marijuana weighing approximately 207.50 kilograms inside the vehicle that QUINTANILLA was driving.

The marijuana was transported to the Rio Grande City Border Patrol Station for processing. QUINTANILLA was taken to Starr County Memorial Hospital where he was medically cleared and released without further issue.

At approximately 11:38 am, DEA Agents Joshua Garza, Ashley Mendiola, and Obong Nsentip read Sergio QUINTANILLA his Miranda Warnings and QUINTANILLA requested an attorney present. No further questioning was conducted on QUINTANILLA.